re Walker's Estate, 110 Cal. 387. Arguing from such decisions, the court in the principal case said, "we can see no reason why a signature by the grantor, under the statute of frauds, or this section of the real property law, may not be stamped on by the letters of a typewriter, as well as by a rubber stamp (*Bennett* v. *Brumfitt,* L. R. 3 C. P. 28), or by the mark of a pen, or by the use of a printed name."

COPYRIGHT—MOVING PICTURES AS DRAMATIZATION OF BOOK.—The defendant, a manufacturer of films for moving picture machines, employed a man to write such a scenario of portions of the book "Ben Hur," as could be acted out, these portions giving enough of the story to be identified with ease. These described actions were then performed by a company of actors, and negatives of the actions were made for use in manufacturing films for moving picture machines used in giving public exhibitions. The owners of the copyright of the book and of the dramatization rights asked for an injunction, claiming that the acts of the defendant constituted an infringement. *Held,* that moving picture films produced in such a manner, necessitated and constituted a dramatization of the book, and are consequently an infringement of the right of dramatization. *Kalem Co.* v. *Harper Brothers, Marc Klaw, Abraham Erlanger, and Henry L. Wallace,* 32 Sup. Ct. 20.

The copyright laws give to authors, not only the right to an exclusive enjoyment of their printed works, but also the right to dramatize the same. U. S. COMP. STAT. 1901, p. 3406. While it is a statutory right, *Wheaton* v. *Peters* 8 Pet. 591; *Kennedy et al.* v. *McTammany,* 33 Fed. 584, yet the "history of the copyright law does not justify so narrow a construction of the word 'writing'." *Harper & Bros.* v. *Kalem Co.,* 169 Fed. 61. It includes public performance as well as many other modes of expression. The same viewpoint applies to the dramatization rights. To constitute dramatization, language is not necessary. *Carte* v. *Duff,* 25 Fed. 187; *Daly* v. *Palmer,* 6 Blatchf. 256, Fed. Cas. No. 3,552. If a pantomime is dramatization, then it is none the less so when exhibited to the audience by means of reflections from a glass instead of by direct vision. The mechanism used does not affect the essence of the case. Consequently the use of a moving picture film and machine, is the use of a reproduction, if anything, only less vivid than that by mirror. The defendant, though not actually exhibiting the films, made, sold, and advertised them for public exhibitions. In so doing he contributed to the infringement. *Harper* v. *Shoppell,* 28 Fed. 613. The fact that only a part of the book was used, does not make it any the less an infringement. *Greene* v. *Bishop,* 1 Cliff. 186; *D'Almaine* v. *Boosey,* 1 You. & Coll. 288. The court expressly distinguishes between a monopoly of ideas and the rights under a copyright.

CORPORATIONS — STOCKHOLDER'S MEETINGS — EFFECT OF WITHDRAWAL OF STOCKHOLDERS.—At the regular annual meeting of a corporation whose by-laws provided that "holders of a majority of the stock issued shall constitute a quorum" stockholders were present representing more than a majority of the shares. A chairman was elected by *viva voce* vote, no objection being made